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PLEASE REPLY TO: SAN FRANCISCO

*Received  
10/4/91  
M. McJannet*

October 3, 1991

Mr. David M. Jones  
Assistant Regional Counsel  
Environmental Protection Agency  
Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

RE: Petroleum Recycling Corporation  
Docket No. TSCA-09-91-0002

Dear Mr. Jones:

Enclosed is a revised schedule of Environmentally Beneficial Expenditures (EBE's), in the format of an exhibit which can be attached to the final consent agreement in the matter referenced above.

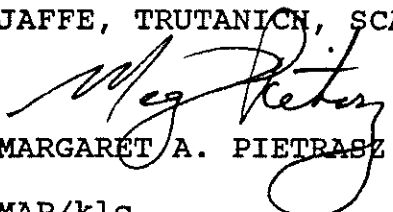
Please let me know as soon as possible if this revised schedule is not acceptable.

Also, it is my understanding that this matter is being settled for a penalty amount of \$45,000, with \$20,000 offset by the EBE's. If my understanding of our settlement agreement is incorrect, please let me know.

If you have any questions regarding the above or the enclosed schedule, please do not hesitate to contact me.

Very truly yours,

JAFFE, TRUTANICH, SCATENA & BLUM

  
MARGARET A. PIETRASZ

MAP/klc  
156-374

cc: John Markley  
Kathleen Tripple

## EXHIBIT A

### Environmentally Beneficial Expenditures

#### I. Oil Recycling

PRC will arrange to accept free-of-charge, used oil from homeowners residing in the vicinity of its Signal Hill, Fontana and Patterson facilities. Homeowner used oil will be accepted during certain hours of certain days. These days and times will be posted at each facility.

PRC will also make available, free-of-charge to homeowners, oil disposal kits which are completely recyclable.

PRC will begin accepting homeowner used oil at its three facilities within six months of execution of the consent judgement.

The costs to set-up and run this program include expenses for manpower to accept and process the oil, recordkeeping, advertising fees, facility remodeling, and manufacture of the oil disposal kits. PRC will document and track these costs, and submit a summary of these costs to EPA at the end of the first, second and third years of operation.

The estimated cost to set-up and run this program for three years at one facility is \$10,000. The estimated cost of this EBE for three facilities for three years is . . . . \$30,000

#### II Industry Outreach

PRC will distribute to other known oil recycling facilities within California, the Quality Assurance/Quality Control program established for PRC under this Consent Judgement. PRC will draft a cover letter to the QA/QC program mailout, explaining the nature and purpose of the program. This will assist other petroleum recycling corporations in instituting appropriate QA\QC programs for their facilities. PRC will accomplish this within six months of the signing of the consent order.

The costs associated with this EBE include the time to draft an appropriate cover letter, the cost of copying documents, the cost to purchase, address and stuff envelopes, and the cost to mail the documents. PRC will document each of these costs and mail a summary to EPA within six months of the signing of the consent order.

PRC estimates that the total cost of this EBE will be approximately . . . . . \$5,000